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Attorneys for Defendant GREAT DESTINATIONS, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

MICHELE DEL VALLE; an individual, for)
herself and all members of the putative
class,

Plaintiff,

v.

GREAT DESTINATIONS, INC., a Nevada
Corporation, and DOES 1 through 100,
inclusive,

Defendants.

Case No. 8:15-cv-00435-JLS-DFM

CLASS ACTION

**STIPULATION TO DISMISS
PLAINTIFF'S INDIVIDUAL CLAIM
WITH PREJUDICE**

SMRH:473562044.1

STIPULATION TO DISMISS PLAINTIFF'S INDIVIDUAL CLAIM WITH PREJUDICE

1 Pursuant to Federal rule of Civil Procedure 41(a), Plaintiff Michele Del Valle
2 (“Plaintiff”) and Defendant Great Destinations, Inc., (“Great Destinations”), stipulate
3 and jointly move that the Court dismiss this action WITH PREJUDICE as to all
4 individual claims asserted by Plaintiff against Defendant, and WITHOUT PREJUDICE
5 as to any claims by the alleged, un-named, putative class members. Since the Court has
6 not certified any class here, the notice and approval requirements of Federal Rule of
7 Civil Procedure 23(e) do not apply. Each party shall bear his or its own fees and costs.
8

9 Date: October 26, 2015

R. REX PARRIS LAW FIRM

10 By: /s/ John M. Bickford
11 John M. Bickford, Esq.

12 Attorneys for Plaintiff
13 and the Putative Class
14

15 Date: October 26, 2015

**SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP**
A Limited Liability Partnership
Including Professional Corporations

19 By: /s/ Ruben D. Escalante
20 Ruben D. Escalante, Esq.
21 Attorneys for Defendant
22 Great Destinations, Inc.
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